

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

| | | |
|---|---|--------------------------------|
| Parker Tirrell, by her parents and next friends |) | |
| Sara Tirrell and Zachary Tirrell, and |) | |
| |) | |
| Iris Turmelle, by her parents and next friends |) | |
| Amy Manzelli and Chad Turmelle, |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | Civil No. 1:24-cv-00251-LM-TSM |
| |) | |
| Frank Edelblut, in his official capacity as |) | |
| Commissioner of the New Hampshire Department |) | |
| Of Education, <i>et al.</i> , |) | |
| |) | |
| Defendants. |) | |

**ASSENTED-TO MOTION TO EXTEND TIME TO RESPOND TO
PLAINTIFFS' SECOND AMENDED COMPLAINT
AND TO INTERVENOR-DEFENDANT'S MOTION TO INTERVENE
TO, AND INCLUDING, JUNE 6, 2025**

Pursuant to Local Rule 7.2 of the Rules of this Court, the United States, on behalf of Federal Defendants, moves this Court to extend the deadline by which it must answer Plaintiffs' Amended Complaint, ECF. No. 95, and respond to Intervenor-Defendant's Motion to Intervene, ECF No. 105, up to, and including, June 6, 2025. In support of this Motion, Federal Defendants state as follows:

On March 14, 2025, Federal Defendants filed, and the Court granted, an Assented-To Motion to Extend Time to Respond to the Proposed Potential Intervenor's Motion to Intervene to April 21, 2025, ECF No. 119, the date that Federal Defendants' Answer to Plaintiffs' Complaint was also due.

On April 21, 2025, Federal Defendants filed an Assented-To Motion to Extend Time to Respond to the Proposed Potential Intervenor's Motion to Intervene, ECF No. 119, and Plaintiffs' Second Amended Complaint, ECF No. DN 105, to June 4, 2025, and this Court issued an Endorsed Order on April 23, 2025, granting that extension.

On May 22, 2025, the United States District Court for the District of Columbia issued a minute order in *Zaid v. Executive Office of the President*, No. 25-cv-1365 (D.D.C.), directing that a combined motion to dismiss and opposition to a preliminary injunction be filed by the United States Department of Justice by May 30, 2025.

As undersigned counsel is also counsel of record in the *Zaid* case and given its expedited filing dates for responsive pleadings, this raised unforeseen complications in undersigned counsel's schedule last week. Accordingly, the Federal Defendants respectfully move this Court to extend the time for responsive pleadings in the instant matter from this Wednesday, June 4, 2025, to this Friday, June 6, 2025.

Counsel for all parties have been contacted and assent to this extension of time.¹ See LR 7.1(c).

The requested extension will not result in the continuance of any hearing, conference or trial. Due to the nature of this Motion, no supporting memorandum of law is required. See LR 7.1(a)(2).

¹ Undersigned counsel did not contact counsel for the potential Intervenor-Defendant for assent since it is not yet a party to the case.

Dated: June 3, 2025

Respectfully submitted,

Washington, D.C.

/s/ Richard Lawson

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